

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re MOODY'S CORPORATION  
SECURITIES LITIGATION

No. 1:07-cv-8375-SWK  
(ECF)

**LEAD PLAINTIFFS' REQUEST FOR DOCUMENTS  
PURSUANT TO RULE 26, 34**

**KIRBY McINERNEY, LLP**

Ira M. Press  
Roger W. Kirby  
Daniel Hume  
David Bishop  
825 Third Avenue, 16<sup>th</sup> floor  
New York, NY 10022  
Telephone: (212) 371-6600  
Facsimile: (212) 751-2540

**GLANCY BINKOW & GOLDBERG LLP**

Lionel Z. Glancy  
Michael Goldberg  
1801 Avenue of the Stars, Suite 311  
Los Angeles, California 90067  
Telephone: (310) 201-9150  
Facsimile: (310) 201-9160

and

Frederick W. Gerkens, III  
1430 Broadway, Suite 1603  
New York, New York 10018  
Telephone: (212) 382-2221  
Facsimile: (212) 382-3944

**SCHIFFRIN BARROWAY TOPAZ &  
KESSLER, LLP**

Michael K. Yarnoff  
Benjamin J. Hinerfeld  
Jennifer L. Keeney  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056

*Co-lead counsel for Lead Plaintiffs  
(additional counsel appears on signature page)*

## **DEFINITIONS & INSTRUCTIONS**

The definitions and instructions are those set forth in the apposite Federal Rules of Civil Procedure, and Local Rule 26.3. In addition, the “SEC Report” means the Summary Report of Issues Identified in the Commission Staff’s Examinations of Select Credit Agencies dated July 2008. “Commission” means the United States Securities and Exchange Commission.

## **DOCUMENTS REQUESTED**

1. All documents comprising or concerning Defendants’ internal records, deal files, internal audit reports, and email communications that are referred to at pp. 3-4 of the SEC Report and that Defendants made available to the Commission in connection with the review described in the SEC Report.

2. All documents comprising or concerning the on-site interviews referred to at page 3 of the SEC Report.

Dated: New York, New York  
September 4, 2008

## **KIRBY McINERNEY, LLP**

By:

/s/ Ira M. Press

Ira M. Press  
Roger W. Kirby  
David Bishop  
825 Third Avenue, 16th Floor  
New York, New York 10022  
Tel: (212) 371-6600  
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& KESSLER LLP**  
280 King of Prussia Rd.  
Radnor, PA 19087  
Tel.: (610) 667-7706  
Fax: (610) 667-7056  
*Co-lead counsel for Lead Plaintiffs*

Christopher Keller  
Jonathan Gardner  
Serena Richardson  
**LABATON SUCHAROW LLP**  
140 Broadway  
New York, New York 10005  
Tel: (212) 907-0700  
Fax: (212) 818-0477